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Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF
LODGING UNDER SEAL BARD'S
MOTION FOR PARTIAL
SUMMARY JUDGMENT AS TO
PLAINTIFF SHERR-UNA
BOOKER'S CLAIMS**

SHERR-UNA BOOKER, an individual,

(Assigned to the Honorable David G.
Campbell)

Plaintiff,

v.

C. R. BARD, INC., a New Jersey
corporation and BARD PERIPHERAL
VASCULAR, INC., an Arizona
corporation,

Defendants.

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively

“Bard”), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6, file this Notice of Lodging Under Seal Bard’s Motion for Partial Summary Judgment as to Plaintiff Sherr-una Booker’s Claims. Bard’s Motion and Memorandum of Law in Support of Motion for Partial Summary Judgment quotes, references, or characterizes Plaintiffs’ personal healthcare information that is protected under HIPAA and confidential under the Stipulated Protective Order. Defendants have notified Plaintiffs of their intent to file this Notice of Lodging. Because the documents lodged under seal only relate to Plaintiffs’ personal healthcare information, Defendants note that it is Plaintiffs’ burden to file a motion to seal. A list of materials lodged under seal and lodged redacted, are attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED 7th day of September, 2017.

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of September 2017, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.

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EXHIBIT A

DOCUMENTS PROPOSED TO BE LODGED REDACTED

Defendants request they be permitted to lodge redacted portions of the following documents:

Defendants' Motion and Memorandum of Law in Support of Motion for Partial Summary Judgment as to Plaintiff Sherr-una Booker's Claims

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